

Federal Financial Institutions Examination Council



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February 11, 2011

The Honorable Darrell E. Issa
House of Representatives
Chairman, Committee on Oversight and Government Reform
2157 Rayburn House Office Building
Washington, DC 20515-6143

Dear Chairman Issa:

The Federal Financial Institutions Examination Council (FFIEC) is in receipt of your letter requesting Freedom of Information Act (FOIA) logs for the past five years. The FFIEC receives a limited number of FOIA requests, zero in FY08, two in FY09, and 24 in FY10; therefore the FFIEC does not presently have a FOIA log or electronic tracking system for the past five years of FOIA requests.

The FFIEC does not have full-time or part-time FOIA personnel. The Chief FOIA Officer for the FFIEC is the Executive Secretary, and the FFIEC FOIA Public Liaison is the Program Coordinator. Legal counsel for FFIEC FOIA requests is provided by the FFIEC's Legal Advisory Group. Since the data produced for FFIEC financial reports is "owned" by one of its five federal member agencies, legal counsel for that agency typically handles the research for FOIA requests for data their agency owns/manages/stores. As such, the FOIA professionals at each of the five federal member agencies implement their system for effective, timely, and accurate research and responses to FFIEC FOIA requests for their data.

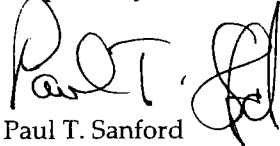
The Chief FOIA Officer and FOIA Public Liaison manage the research and response for data or information that is stored within the FFIEC's offices or website. As these requests are rare, they are a high priority as soon as they are received, appropriate steps are taken, and legal counsel is involved immediately if necessary. As a result, a response is made no later than by the date due according to the FFIEC FOIA regulation. There have been no backlogs or delays in responding to FOIA requests in FY09 or FY10, nor were there any administrative appeals or litigation resulting from FOIA requests to the FFIEC.

The FFIEC is fully versed in President Obama's FOIA Memorandum and the Attorney General's FOIA Guidelines, and has recently submitted both the Annual FOIA Report (final) and the Annual Chief FOIA Officer Report (draft) to the Department of Justice detailing the FFIEC's application of the presumption of openness and proactive disclosures throughout the last reporting year. Copies of these two reports are enclosed.

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I trust you will find this summary and the enclosed reports to be responsive and thorough regarding the FFIEC's timely and nondiscriminatory manner for responding to all requests for information under the FOIA.

Respectfully,

A handwritten signature in black ink, appearing to read "Paul T. Sanford", with a stylized flourish at the end.

Paul T. Sanford
Executive Secretary, FFIEC

Enclosures (2)

PTS:rlp